

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,

*Plaintiff/Counterclaim-
Defendant*

v.

CHANBOND, LLC,

Defendant/Crossclaim-
Defendant

DEIRDRE LEANE, and IPNAV, LLC

*Defendants/Counterclaim
Plaintiffs/Crossclaim-
Plaintiffs.*

C.A. No. 1:21-cv-01456-MN

**PROPOSED INTERVENORS' MOTION FOR LEAVE TO PARTICIPATE IN ORAL
ARGUMENT REMOTELY**

Proposed intervenors, Gregory Collins and Kamal Mian, derivatively on behalf of Unified Online, Inc. (“Intervenors”) respectfully request that the Court permit Steven Rader, Esq. (“Mr. Rader”), counsel for Intervenors, to participate and present in oral argument by video or telephonic appearance.

1. Pursuant to Oral Order dated April 6, 2022 [D.I. 64], this case is currently scheduled for oral argument regarding Defendant ChanBond, LLC’s Emergency Request to Protect Confidentiality of ChanBond, LLC’s Under Seal Filing [D.I. 59] and Intervenors’ Response to Emergency Request to Protect Confidentiality [D.I. 60] to be held in the United States District Court for the District of Delaware, J. Caleb Boggs Federal Building, 844 N. King Street, Wilmington, DE 19801, Courtroom 4A on April 25, 2022 at 4:30 p.m.

2. Fed. R. Civ. P. 43(a)'s provision for remote appearance by testifying witnesses has also been applied to non-testimonial roles. See e.g. *Shell v. Henderson*, 2013 WL 4502271 *1 (D. Colo.)

3. Mr. Rader is located in Irvine, California. Traveling to and staying in Wilmington, Delaware for argument would require extensive close contact with a large number of people at a time when the City of Philadelphia (home to the closest major airport) is re-introducing masking mandates due to increased COVID-19 community transmission which appear to be the BA.1 – BA.5 variants of the Omicron strain. Even with personal protective equipment, the risk could be mitigated with a remote appearance.

4. Local counsel for Intervenors will appear in person at the court hearing.

5. For the foregoing reasons, Intervenors respectfully request that the Court permit Mr. Rader to participate in the April 25, 2022 oral argument remotely either by videoconference or teleconference.

6. Counsel for CBV, Inc.; Deirdre Leane and IPNAV, LLC have stated that they do not oppose this motion, but counsel for ChanBond, LLC has stated they oppose the motion.

Respectfully submitted,

THE WILLIAMS LAW FIRM, P.A.

By: *s/ John L. Williams*

John Legaré Williams (Del. Bar #4473)
Brian Charles Crawford (Del. Bar #4941)
1201 N. Orange Street, Suite 600
Wilmington, DE 19801
Tele: (302) 575-0873
Fax: (302) 575-0925
E-mail: John@TrustWilliams.com
Brian@TrustWilliams.com

and

CENTAURI LAW GROUP, P.C.

Steven L. Rader (pro hac vice)
Jason R. Dilday (pro hac vice)
15615 Alton Pkwy, Suite 245
Irvine, CA 92618
Phone: (949) 336-5716
E-mail: SRader@centaurilaw.com
JDilday@centaurilaw.com

*Attorneys for proposed intervenors
KAMAL MIAN and GREGORY COLLINS
Derivatively on behalf UNIFIEDONLINE, INC.*

Dated: April 14, 2022